

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



CARPATHIAN ENERGY COMPANIE
PETROLIERA S.R.L.

PLAINTIFF

V.

CIVIL ACTION NO. 3:17cv356LG-RHW

AMROMCO ENERGY L.L.C.;
AMROMCO ENERGY S.R.L.;
JOHN AND JANE DOES 1 THROUGH 10; AND
JOHN DOE ENTITIES, I THROUGH 5

DEFENDANTS

NOTICE OF REMOVAL

Defendant Amromco Energy, S.R.L. ("Amromco") gives notice of the removal of this action from the Circuit Court of Hinds County, Mississippi to this Court pursuant to 28 U.S.C. §§ 1332(a), 1441, and 1446, and in support hereof state as follows:

1. Plaintiff Carpathian Energy Companie Petroliera S.R.L. ("Carpathian") filed this action in Hinds County Circuit Court on April 10, 2017, and served Amromco the following day on April 11, 2017. No answer or responsive pleading has yet been filed with the circuit court.

2. The Court has jurisdiction of this action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Amromco and Carpathian, and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

3. Carpathian is a Romanian limited liability company whose members consist of one citizen of Mississippi and three foreign nationals. Amromco is a Romanian limited liability company. Amromco's members or owners are citizens of various states, including Texas, and foreign countries, but none of Amromco's members is a citizen of Mississippi.

The other named defendant, Amromco LLC, no longer exists. Exhibit 1 (certificate of dissolution).

4. The complaint does not specify the dollar amount at issue, but the amount in controversy exceeds the sum or value of \$75,000. Carpathian filed this action seeking to, among other things, cancel and rescind the Farmout Agreement and Joint Operating Agreement it entered into with Amromco to drill and produce oil and gas fields in Romania. Pursuant to the Farmout Agreement, Amromco initially acquired an undivided 67.5% working interest in two oil and gas fields. Pursuant to the Farmout Agreement and the Operating Agreement that is called for by that Farmout Agreement, Amromco later spent over \$40 million in costs to conduct oil and gas operations to explore and develop the two fields, including but not limited to the costs of a seismic survey and costs to drill and produce oil and gas wells. To date, Amromco has paid for more than 67.5% of those costs.

5. On May 3, 2017, John Moore, attorney for Carpathian, and Mia Vahlberg and Dave Keglovits, attorneys for Armoco, had a telephone discussion regarding arbitration proceedings before the American Arbitration Association (“AAA”) for the arbitration of the disputes between the parties. Mr. Moore agreed that the amount at issue involves more than \$75,000. Ms. Vahlberg followed up with an email confirming what they had discussed, including that the amount at issue was more than \$75,000. Later, on May 8, 2017, during an administrative call with the AAA, they again discussed the amount at issue, which was relevant for purposes of determining the applicable set of AAA rules that would apply during the arbitration proceedings. Mr. Moore and Ms. Vahlberg told the AAA representative that they agreed that the amount in controversy exceeded \$75,000. Exhibit 2 at ¶¶ 2-4 (affidavit of Mia Vahlberg) and Exhibit A thereto.

6. Pursuant to 28 U.S.C. § 1446(d), Amromco will immediately file with the clerk of the Hinds County Circuit Court a true and correct copy of this notice.

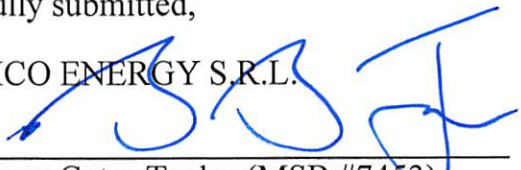
7. A copy of all process, pleadings, and orders served upon Amromco is attached hereto as Exhibit 3.

This the 11th day of May, 2017.

Respectfully submitted,

AMROMCO ENERGY S.R.L.

By:


Glenn Gates Taylor (MSB #7453)

Christy M. Sparks (MSB # 101381)

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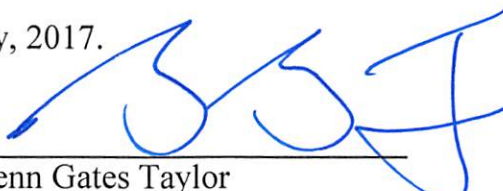
**ATTORNEYS FOR DEFEDANT
AMROMCO ENERGY S.R.L.**

CERTIFICATE OF SERVICE

I, Glenn Gates Taylor, do hereby certify that I have this date served by electronic filing and, if necessary, by United States mail, postage prepaid, a copy of the foregoing pleading to all counsel as follows:

John D. Moore, Esq.
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This the 11th day of May, 2017.



Glenn Gates Taylor